

# KING & SPALDING

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May 4, 2022

**BY ECF**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Google LLC v. Starovikov, et al.*, Case No. 1:21-cv-10260-DLC**

Dear Judge Cote:

I write on behalf of Plaintiff Google LLC (“Google”) regarding service on the Doe Defendants in the above-captioned case.

Consistent with the methods of alternative service that the Court ordered (ECF 8 ¶ 18) and the further description of those methods in my declaration in support of Google’s motion for a temporary restraining order (“TRO”) (ECF 24 ¶¶ 11-15), Google served all Defendants by sending the pleadings to a physical address in Russia and to various email addresses associated with Defendants.

In connection with the disruption of the botnet, Google also served the Court’s TRO on the third-party internet domain registrars (the “registrars”) and IP address hosting companies (the “ASNs”) for the domains and IP addresses associated with Glupteba. *See* ECF 8 at 12-15; ECF 5-1 (appendix listing registrars and ASNs for the Glupteba domains and IP addresses). Many of the registrars and ASNs now have provided contact information associated with the relevant accounts (*e.g.*, physical addresses, email addresses, and phone numbers). To further ensure that service on the Doe Defendants has been completed, Google intends to serve its pleadings and the Court’s orders by sending them to the email addresses and phone numbers obtained from registrars and ASNs (except to the extent the email addresses have been disabled in the disruption efforts) in the coming days. *See* ECF 8 ¶ 18; *see also* ECF 24 ¶¶ 14-15.

Due to Russia’s recent invasion of Ukraine, physical mail is no longer practically available as a method of service in Russia.<sup>1</sup> Google therefore respectfully requests that the Court also order additional alternative methods of service pursuant to Rule 4(f)(3) granting Google leave to also

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<sup>1</sup> *See, e.g., UPS and FedEx halting shipments to Russia and Ukraine*, Reuters (Feb. 27, 2022), <https://www.reuters.com/business/autos-transportation/ups-fedex-halting-shipments-russia-ukraine-2022-02-27/>.

The Honorable Denise L. Cote

May 4, 2022

Page 2

serve the Doe Defendants through publication of Google's pleadings and the Court's orders on a publicly available Internet website.

Finally, Google requests that the Court grant it until May 13, 2022 to complete these alternative methods of service on the Doe Defendants. *See* Fed. R. Civ. P. 4(m).

Respectfully submitted,

/s/ Laura Harris

Laura Harris